

**RESPONSE AND REQUEST FOR RECONSIDERATION**

Claim 1-22 have been rejected under 35 U.S.C. 102(e) as being anticipated by Helbing et al., (U.S. Patent No. 6,555,616). Applicants respectfully traverse this rejection.

Applicants' claimed invention relates to a method for providing a resinous coating material on glass exhibiting improved adhesion comprising supplying to said glass a coating composition comprising (i) a reactive sulfonic acid derived compound and (ii) a resinous coating material.

The Examiner maintains that the Helbing teaches a method of preparing a fiberglass composition comprising an ammonium salt of an aryl sulfonic acid and a resin. The Examiner then concludes that Applicants' claimed invention is anticipated by Helbing.

Applicants' claimed invention is directed to a method of supplying to glass a coating composition comprising a reactive sulfonic acid derived compound and a resinous coating material. Helbing, on the other hand, is directed to a fiberglass composition and method of preparing such composition using a resin binder, wherein the resin binder comprises a resole resin and a catalyst comprising an ammonia salt of an aryl sulfonic acid. Helbing's fiberglass compositions and methods of preparing such do not comprise a reactive sulfonic acid derived compound. Applicants' reactive sulfonic acid derived compound is described, amongst other places in the present application, on page 5 at lines 11-18: *as "a compound that has an additional reactive functionality in the molecule, beside the sulfonic acid or sulfonate moiety. The additional reactive portion permits chemical reaction or interaction of the molecule with other molecules of the same or similar species, or with molecules of a resinous coating material, or with glass substrate. A preferred reactive moiety is an olefinic double bond."* By contrast, Helbing's ammonia salt of an aryl sulfonic acid does not contain an additional reactive function, (i.e., an olefinic double bond). Accordingly, the present claims are not anticipated by Helbing.

Moreover, the above mentioned prior art is not obviousness-type prior art (U.S.C 103) because, in addition to the reasons set forth above, there is no teaching, motivation or suggestion in Helbing for someone skilled in the art to use a reactive sulfonic acid derived compound in a fiberglass composition or the associated manufacturing process. Furthermore, Helbing teaches that the ammonia salt of an aryl sulfonic acid is used as the catalyst component of the resole resin binder composition, where the ammonium aryl sulfonate salts in the resin binder composition enhances cure rates, increases thermal stability and reduces corrosiveness to metals (see Helbing, Abstract and col 4

lines 45-47) and not (as in the present invention) to promote adhesion or dispersion of glass in the system. There is no teaching, motivation or suggestion in Helbing that the ammonia salt of an aryl sulfonic acid promotes adhesion or dispersion of glass in the system. Additionally, Helbing teaches that the nature/structure of the sulfonic acid is not critical provided that it is soluble in an aqueous resin binder composition and provided its acid functionality is capable of catalyzing polymerization of the resole resin (see Helbing col 4 @ lines 47-51). Thus, there would be no motivation for Helbing to change from his ammonium aryl sulfonate salt to the reactive sulfonic acid derived compound of the present invention. Accordingly, the present claims are not obvious from Helbing.

In view of the above arguments, Applicants respectfully submit that the claimed invention is novel and not suggested by or obvious from the cited art and the rejection should be withdrawn.

For the foregoing reasons it is submitted that the present claims are in condition for allowance. The foregoing remarks are believed to be a full and complete response to the outstanding office action. Therefore an early and favorable reconsideration is respectfully requested. If the Examiner believes that only minor issues remain to be resolved, a telephone call to the Undersigned is suggested.

Any required fees or any deficiency or overpayment in fees should be charged or credited to The Lubrizol Corporation Deposit Account No. 12-2275.

Respectfully submitted,  
THE LUBRIZOL CORPORATION

A handwritten signature in black ink, appearing to read 'Jason S. Fokens', is written over a horizontal line.

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